

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	Bankruptcy No. 18-12316-REF
ERIC M. MERTZ,	:	
Debtor.	:	Chapter 13
	:	
PNC BANK, NA	:	
Movant,	:	
v.	:	
	:	
ERIC M. MERTZ,	:	
Respondent.	:	

RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW comes the Debtor, by and through his attorney, Stephen M. Otto, Esquire, and files the within response to Motion for Relief from the Automatic Stay, of which the following is a statement:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.
10. Admitted.
11. Movant's allegation is a conclusion of law to which no response is necessary.

12. Admitted.

Debtor's Affirmative Statement: Debtor experienced unanticipated difficulty with employment upon the initial filing of the case but now has funds in hand to commence payments in this case.

WHEREFORE, Debtor respectfully requests this Honorable Court to duly weigh his response.

Respectfully submitted,
LAW OFFICE OF STEPHEN M. OTTO, LLC

By: /s/Stephen M. Otto
Stephen M. Otto, Esq.
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CERTIFICATE OF SERVICE

I, Stephen M. Otto, hereby certify that I served or caused to be served the foregoing Response upon the Parties listed below via ECF only.

Kevin G. McDonald, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532

DATE: August 10, 2018

By: /s/Stephen M. Otto
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